

JASON M. FRIERSON
 United States Attorney
 Nevada Bar No. 7709
 DANIEL D. HOLLINGSWORTH
 Assistant United States Attorney
 Nevada Bar No. 1925
 501 Las Vegas Boulevard South, Suite 1100
 Las Vegas, Nevada 89101
 Telephone: 702-388-6336
 Daniel.Hollingsworth@usdoj.gov
 Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KING ISAAC UMOREN,

Defendant,

EAST HAWLEYWOOD OWNERS'
 ASSOCIATION,

Petitioner.

2:19-CR-064-APG-NJK

**Government's Unopposed Motion to
 Extend the Time to File its Response
 Regarding Motion for Ancillary Hearing,
 ECF No. 166, and Order**

(First Request)

The United States of America respectfully moves this Court for an Order extending the time for the government to file its response regarding East Hawleywood Owners' Association's (EHOA) Motion for Ancillary Hearing, ECF No. 166. The current deadline is August 30, 2022. The government requests an extension of time to and including September 29, 2022. This is the first request.

The reason for this extension is the parties are actively negotiating the forfeiture issue.

On August 16, 2022, EHOA filed its Petition for Ancillary Hearing. It is not a motion. After third-parties file petitions and after the district court resolves any government motions to dismiss the third-party petitions, the district court may permit discovery according to the Federal Rules of Civil Procedure.¹

¹ Fed. R. Crim. P. 32.2(c)(1)(a) and (B).

1 On August 18, 2022, the undersigned began negotiating a stipulation for entry of
2 forfeiture with Troy Isaacson, counsel for EHOA. The undersigned is currently waiting for
3 additional billing information from Mr. Isaacson's client.

4 On August 22, 2022, Mr. Isaacson agreed to a month extension.

5 This Motion is not submitted solely for the purpose of delay or for any other
6 improper purpose.

7 This Court should grant an extension of time to, and including, September 29, 2022.

8 DATED: August 23, 2022.

9 JASON M. FRIERSON
10 United States Attorney

11 /s/ Daniel D. Hollingsworth
12 DANIEL D. HOLLINGSWORTH
13 Assistant United States Attorney

14
15 IT IS SO ORDERED:

16
17 
18 ANDREW P. GORDON
19 UNITED STATES DISTRICT JUDGE

20 DATED: August 24, 2022
21
22
23
24
25
26
27
28